

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE

Plaintiff,

C.A. NO: 02-CV-4440

v.

**TRANS UNION LLC
CITY OF PHILADELPHIA**

Defendant.

JOINT MOTION FOR EXTENSION OF TIME

Trans Union LLC (“Trans Union”) and Plaintiff (collectively referred to as the “Parties”), by and through their undersigned attorneys, jointly move that the case be removed from the July 14 trial pool and rescheduled on or after August 25, 2003:

1. Plaintiff commenced this action alleging that Defendant Trans Union violated the Fair Credit Reporting Act, 15 U.S.C. §1681 *et seq.* (the “FCRA”) because it reported certain allegedly inaccurate credit information relating to Plaintiff.

2. The Parties have engaged in serious settlement discussions and extensive discovery, including written discovery and depositions of plaintiff, two Trans Union witnesses, and a third party damages witness. The Parties have subpoenaed a third party vendor, but scheduling issues have prevented that deposition from being conducted. A former Trans Union employee will be deposed, if located. After such discovery has been accomplished, the Parties will resume settlement discussions. If deemed appropriate, the Parties may seek a settlement conference with the Court pursuant to the scheduling Order.

3. Counsel for Plaintiff and Counsel for Trans Union also have vacation plans which will conflict with the July 14 trial pool schedule. Counsel for Trans Union, Bruce S. Luckman, Esquire, has prepaid vacation plans (a non-refundable beach rental house) from July 18 through

August 3, 2003. Counsel for plaintiff, John Soumilas, Esquire also has vacation plans from August 2 through August 12, 2003.

4. Further, counsel for plaintiff and Trans Union are litigating several other FCRA matters, including Sheffer v. Sears, Trans Union LLC, et al, 02-CV-1243 ((Schiller, J), which is set for jury trial on August 18, 2003). Counsel for Trans Union is also previously set for jury trial on August 20, 2003 in Northam v. Trans Union, 3:03-CV-0143, United States District Court for the Eastern District of Virginia (Hudson, J)

5. Accordingly, the Parties respectfully request that the Scheduling Order be modified and extended as follows:

a) Trial pool, on or after August 25, 2003;

6. This extension of time is sought in the interests of justice and is made in good faith and not to unnecessarily delay the trial of this action.

WHEREFORE, Defendant Trans Union LLC and Plaintiff, Grace Lawrence, jointly, respectfully request that this Court grant an extension of time.

Respectfully Submitted this 10th Day of June, 2003.

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